

Exhibit 548

PLAINTIFFS' OMNIBUS OPPOSITION TO DEFENDANTS' MOTIONS FOR SUMMARY JUDGMENT

Case No.: 4:22-md-03047-YGR
MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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5 **UNITED STATES DISTRICT COURT**
6 **NORTHERN DISTRICT OF CALIFORNIA**

7 **IN RE: SOCIAL MEDIA ADOLESCENT**
8 **ADDICTION/PERSONAL INJURY**
9 **PRODUCTS LIABILITY LITIGATION,**

10 **THIS DOCUMENT RELATES TO:**

11 Charleston County School District v. Meta
12 Platforms Inc., et al.

13 Member Case No.: 4:23-cv-4659

Case No. 4:22-MD-03047-YGR

MDL No. 3047

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15 My name is Lisa Kathryn Allison, and I make this declaration based on my personal
knowledge.
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17 1. I received a Bachelor of Arts in Psychology and Music in 1996 from the University of
Richmond. I received a Master of Education in School Psychology in 1998 from The Pennsylvania
State University.
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19 2. I have 24 years of experience working in PreK-12 education.
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21 3. I have been an Executive Director of Student Support in Charleston County School District
("CCSD") since 2023 and have worked at CCSD since 2001.
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23 4. From 2001 to 2016, I worked as a School Psychologist in CCSD elementary schools.
Between 2016 and 2018, I was the School Climate Coordinator for all CCSD schools. My next
position at CCSD was as Director of Intervention and Psychological Services, a position I held
from 2018 to 2022.
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26 5. In my position as Executive Director for Student Support, I supervise the district's programs
for student support services. Specifically, I oversee staffing, programming, and wrap-around
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1 services for students including college and career readiness, multi-tiered system of supports
2 (MTSS), positive behavior interventions and supports (PBIS), school psychology services, school
3 counseling services, social work services, behavior specialist services, clinical counseling and
4 psychology services, mental health and wellness supports, substance use prevention and
5 intervention, Project Prevent grants services, medical homebound instruction services, and
6 partnerships with community-based organizations. I am also responsible for the Student Support
7 budget.

8 6. In addition, I oversee CCSD's restorative practices program, school climate program, and
9 crisis response and threat assessment training and response.

10 7. Over the past three years, there has been a 50% increase in the number of safety assessments
11 conducted in the district. Threat Safety assessments are a process used whenever a student makes
12 a threat against themselves, another student or a CCSD employee, school or facility. In addition,
13 over the past three years, there has been an 80% increase in the number of threat safety assessments
14 specifically for threats toward others. Every threat toward others that CCSD learns of is assessed
15 through multiple layers of information to determine if a student is demonstrating behaviors that
16 could lead to violence. This process is based on the recommendations of the U.S. Secret Service
17 and the S.C. Department of Education. The goal of a threat assessment is to determine whether a
18 student poses a threat and what interventions are necessary to prevent an act of violence from being
19 carried out. A multidisciplinary team is involved which can include an administrator from the
20 department of Security and Emergency Management, a school mental health provider, school
21 administrator, member of the Office of Exceptional Children, and law enforcement. These threat
22 assessments take place approximately once a week on average across the district with variability
23 by level (secondary schools needing more assessments).

24 8. Social workers are also involved in threat assessments, for example, helping families access
25 community supports, providing direct services to students for mental health needs, and helping
26 students after a threat of suicidal ideation.

27 9. Threat assessments are overwhelmingly related to social media. In addition to the threat
28 assessments we know are social media related, there are students who do not share the underlying

1 reason for their referral, so it is very likely there are more threat assessments related to social media
2 than the overwhelming number of which we are already aware. I believe this increase is correlated
3 with the increase in student's use of social media platforms.

4 10. For school psychologists, school counselors, and social workers who are tasked with dealing
5 with threats, bullying, fights, and property damage with a nexus to social media, a substantial
6 amount of their time is spent addressing the fallout of social media's negative impact on students.

7 11. A single incident involving a threat assessment, especially one related to social media and
8 a threat of harm to others, can take up to 10 hours of an evaluator's time.

9 12. I regularly interact with supervisory staff in my department who have daily contact with
10 school psychologists, counselors, and social workers for children in grades PreK-12 within the
11 CCSD. Based on these interactions, it is my understanding that staff in these categories spend a
12 significant amount of time addressing social media related concerns and that the amount and
13 percentage of their time that staff have had to spend on social media related concerns has increased
14 substantially over the last several years.

15 13. Problems arising out of students' use of social media platforms is so pervasive that it
16 consumes at least 45% of school psychologists, counselors, and social workers' time on any given
17 day, according to my colleagues who report to me and who are familiar with the day-to-day issues
18 of staff in these categories who work closely with students. This represents a marked increase over
19 time, from the reported estimate of 10% of their time spent on these issues in 2017.

20 14. Because the significant amount of time spent addressing social media impacts on students,
21 school psychologists, counselors, and social workers have less time dedicate to other aspects of
22 their jobs.

23 15. Over approximately the past decade, I have witnessed, and through discussions with my
24 colleagues at CCSD, have come to understand they have also experienced, an increase in issues
25 involving the use of social media as well as the effects of the negative aspects of social media usage
26 on students. During this time, students have experienced increasing anxiety, depression, self-doubt,
27 cyberbullying, and an increasing inability to connect to each other through in-person interaction.

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1 16. The bullying and harassment that occurs on social media platforms exacerbates the issues
2 the counselors and administrators must address. Dissemination of bullying and harassment on
3 social media platforms means that the reach of bullying and threats is far greater, and the time
4 students must endure them is longer than it was when similar student interactions occurred in
5 person.

6 17. In my experience, students' compulsive use of social media interrupts healthy normal
7 functioning day-to-day including the ability to complete schoolwork, regularly attend school, and
8 maintain a healthy sleep routine. At CCSD, we often hear from parents that their children are
9 experiencing these issues because of their inability to stop engaging with social media no matter
10 how strictly parents attempt to monitor and control usage.

11 18. It is also my experience that students interact with each other much more harshly through
12 social media than they would in person. This is harming their relationships and their ability to
13 empathize and interact with their peers in a healthy way has been diminished by the amount of time
14 spent on social media platforms.

15 19. In response to students' increased need for mental health support, CCSD has implemented
16 several programs to address these needs and help students build skills and coping strategies
17 specifically aimed at mitigation of the issues being experienced by students because of the negative
18 effects of social media use.

19 20. In 2018, CCSD began training staff implement restorative practices. The primary goals of
20 implementing restorative practices at CCSD include relationship skill building, reducing bullying
21 behavior and decreasing behaviors leading to exclusion from school.

22 21. Restorative practices help students develop crucial social-emotional skills by teaching them
23 to take responsibility, repair harm, and rebuild relationships after conflicts. By focusing on healing
24 relationships rather than punishment, schools can create more equitable environments where
25 students have opportunities to learn from their mistakes while maintaining their dignity and
26 connection to the school community.

27 22. The International Institute for Restorative Practices ("IIRP") has been the primary provider
28 of training and coaching services for restorative practices for CCSD's staff from 2018 to present.

1 In addition, in 2023 and 2024, CCSD invested in training, including professional development for
2 staff as well as team building and conflict resolution practices offered by Restorative Coaching.
3 CCSD has also engaged Restorative Resolutions for educational training services, coaching
4 support, and consulting services between 2021 and 2024.

5 23. The implementation of restorative practices has included training for staff, integration with
6 the existing PBIS programs, community-building, and family engagement as well as listening
7 circles and conflict circles for staff and students.

8 24. Based on the increase in incidents directly and indirectly related to social media, concurrent
9 with an increase in the interpersonal issues restorative practices are designed to address, I estimate
10 that 40% of all purchased services from IIRP, Restorative Coaching, and Restorative Resolutions
11 are related to addressing problems caused by social media.

12 25. Capturing Kids' Hearts is a program by the Flippen Group that provides professional
13 development to empower CCSD teachers, faculty, and staff to build a culture of connectedness and
14 strong relationships so students can flourish academically. I estimate that approximately 7% of the
15 cost of this program is directly related to combating the negative relational effects of social media.

16 26. CCSD also licenses and utilizes Panorama Education which is a comprehensive K-12
17 assessment and data platform that helps schools measure, understand and support students' social-
18 emotions learning, academic progress, and overall school climate. CCSD first initiated this program
19 in 2017; however, CCSD began to rely on this program in 2021 and has used it increasingly from
20 that year forward to the present. I estimate that 20% of the costs of this program are directly
21 attributable to student use of and the negative effects resulting from social media.

22 27. CCSD has also purchased and implemented Botvin LifeSkills Training through Prevention
23 Science Press, Inc. Botvin Lifeskills is aimed at preventing and mitigating substance abuse,
24 including drugs, alcohol, and tobacco. However, I estimate that, over time, approximately 35% of
25 the services provided through this program relate to social media in some manner as it focuses
26 heavily on life skills, including coping skills necessary to deal with anxiety, depression, and
27 bullying, much of it arising from the use of social media platforms.

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1 28. In my experience, substance abuse is symptomatic of underlying mental health issues, such
2 as the anxiety and depression that we have observed increasing among our students in conjunction
3 with their compulsive use of social media.

4 29. Second Step, purchased through the Committee for Children, is a social emotional learning
5 curriculum that was first instituted by CCSD in 2017. Initially, it was rolled out to PreK and then
6 rolled up to successive grades by grade level. This roll-out occurred over a period of approximately
7 five years. It is now universal for nine grades, PreK to eighth grade, throughout the district. Over
8 time, approximately 35% of the total expenditures related to Committee for Services are attributable
9 to social media's impacts on CCSD and efforts to mitigate these impacts.

10 30. ReThink Ed, purchased through ReThink Autism, is a social emotional learning curriculum
11 that was first instituted by CCSD in 2022 for high school. Currently ReThink Ed licenses are
12 available for all middle and school students and for all counselors in grades K-12.

13 31. To begin to address the underlying causes, in 2024 CCSD licensed Screenagers from the
14 Social Emotional Learning Alliance for South Carolina and hosted expert panels in conjunction
15 with screenings. This effort was aimed at educating students and parents regarding the link between
16 social media and mental health. While Screenagers contains a portion of material examining
17 vaping, drugs, and alcohol, even this portion is aimed at the impact of digital and social media on
18 youths' use of these substances. Approximately 80% of the funds expended on Screenagers and the
19 associated panels are attributable directly to social media's impacts on CCSD and efforts to mitigate
20 these impacts.

21 32. My colleagues have also reported that the age at which students access social media are
22 increasingly younger. It is evident that this problem is widespread as Screenagers now offers an
23 “Elementary School Age Edition,” to address issues faced by children aged eleven and younger.

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1 Pursuant to 28 U.S.C. § 1746, I hereby declare and certify, under penalty of perjury, that the
2 foregoing is true and correct.

3 Executed on 5/15/2025.

4 DocuSigned by:
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Lisa Kathryn Allison
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